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I.R.A. DOCKET ROOM

Of Counsel
H LaDon Baltimore

April 29, 2004

Tennessee Regulatory Authority
Attn: Sharla Dillon
460 James Robertson Parkway
Nashville, TN 37238

Via Hand Delivery


Re Citizens Path II Disaggregation Plan of the Federal Universal Service Fund,
Docket No 04-00098

Dear Ms Dillon:

Enclosed for filing please find the original and thirteen (13) copies of a letter to Chairman Tate in the above-referenced matter. Please date stamp the fourteenth copy for the courier to return to my office.

Please do not hesitate to contact me if you have questions or if we need to discuss this.

Sincerely,



H LaDon Baltimore
Ben Lomand Communications, Inc

LDB/dcg
Enclosures
cc. Parties of record
Levoy Knowles

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William N Bates
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T.R.A. DOCKET ROOM

April 29, 2004

Debbie Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re. Citizens Path II Disaggregation Plan of the Federal Universal Service Fund,
Docket No 04-00098

Dear Chairman Tate

On behalf of my client, Ben Lomand Communications, Inc , I want to thank the Tennessee Regulatory Authority for granting the motion of Ben Lomand Communications, Inc for an extension of time to file comments in the above-referenced matter

Due to such extension of time, my client was able to retain specialized expertise to evaluate the Amended Disaggregation Plan of Citizens of Tennessee. After evaluation of the plan, Ben Lomand Communications, Inc will not contest the disaggregation plan as filed and which does not become effective until approved by the Tennessee Regulatory Authority. Therefore, Ben Lomand Communications, Inc has no further comments.

Attached as Exhibit A is a copy of a letter from John Staurulakis, Incorporated, which was retained by Ben Lomand Communications, Inc in this matter

If you have any questions or comments, do not hesitate to contact me

Respectfully submitted,

H. LaDon Baltimore / with permission of
H LaDon Baltimore, BPR #003836
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phone 301-459-7590, fax 301-577-5575
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Ben Lomand Communications, Inc
Levoy Knowles, Executive Vice President
PO Box 638
McMinnville, TN 37111

Dear Mr Knowles,

John Staurulakis, Inc ("JSI") was requested by Ben Lomand Communications, Inc to do a review of Citizens Telecommunications Company of Tennessee, LLC's ("Citizens") USF disaggregation plan for Study Area 294336

Citizens filed Path 2 for Study Area 294336 Under Path 2, the plan does not go into effect until the State Commission formally approves the filing Based on our review of the filing, the Commission is still reviewing the plan for approval JSI reviewed the plan to determine if Ben Lomand Communications, Inc should object to the proposed disaggregation prior to the Commission approval

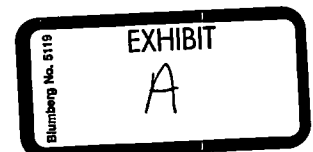
Citizens' disaggregation plan segregated wire centers within the study area into three zones based on the results of their forward-looking cost model – the Citizens Costmap Wireline Model and the HAI 50a model The FCC rules do allow disaggregation into three zones which Citizens has done in their filing JSI did not have access to the Citizens Costmap Wireline Model nor the supporting data for the disaggregation plan As an alternative, JSI used the Federal Communications Commission Hybrid Cost Proxy Model to calculate loop costs for the study area in question

Based on our findings, JSI does not recommend contesting the disaggregation plan as filed

If you should have any questions or concerns please feel free to call me at 301-459-7590

Sincerely,

Connie Urdal
Senior Consultant



Debbie Taylor Tate, Chairman
April 29, 2004
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Certificate of Service

The undersigned hereby certifies that on this the 29th day of April, 2004, a true and correct copy of the foregoing has been forwarded via first class U. S. Mail, hand delivery, or overnight delivery to the following

Ardmore Telephone Company, Inc
P O Box 549
517 Ardmore Avenue
Ardmore, TN 38449

BellSouth
333 Commerce Street
Nashville, TN 37201-3300

Century Telephone of Adamsville
P O Box 405
116 N Oak Street
Adamsville TN 38310

Century Telephone of Claiborne
P O Box 100
507 Main Street
New Tazewell, TN 37825

Century Telephone of Ooltewah-Collegedale, Inc.
P.O. Box 782
5616 Main Street
Ooltewah, TN 37363

Citizens Communication Company of Tennessee
P O Box 770
300 Bland Street
Bluefield, WV 24701

Citizens Communication Company of the Volunteer State
P O. Box 770
300 Bland Street
Bluefield, WV 24701

Loretto Telephone Company, Inc
P O. Box 130
Loretto, TN 38469

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Millington Telephone Company, Inc.
P O Box 429
4880 Navy Road
Millington, TN 38083-0429

Sprint-United
112 Sixth Street
Bristol, TN 37620

TDS Telecom-Concord Telephone Exchange, Inc
P O. Box 22610
Knoxville, TN 37933-0610

TDS Telecom-Humphreys County Telephone Company
P O Box 552
203 Long Street
New Johnsonville, TN 37134-0552

TDS Telecom-Tellico Telephone Company, Inc
P O Box 9
102 Spence Street
Tellico Plains, TN 37385-0009

TDS Telecom-Tennessee Telephone Company
P O. Box 22995
Knoxville, TN 37933-0995

TEC-Crockett Telephone Company, Inc
P O Box 7
Friendship, TN 38034

TEC-People's Telephone Company, Inc
P O Box 310
Erin, TN 37061

TEC-West Tennessee Telephone Company, Inc
P O. Box 10
244 E Main Street
Bradford, TN 38316

United Telephone Company
P O Box 38
120 Taylor Street
Chapel Hill, TN 37034

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April 29, 2004
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Associate General Counsel - Eastern Region
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J Michael Swatts
State Government Affairs Director
Citizens Communications
300 Bland Street
P O. Box 770
Bluefield, WV 24701

Guilford F Thornton, Jr., Esq.
Stokes, Bartholomew, Evans & Petree
424 Church Street, Suite 2800
Nashville, TN 37219
(via facsimile transmission & via U. S. Mail)

*H. LaDon Baltimore / with permission
H LaDon Baltimore*